American Petroleum Institute's Public Awareness Recommended Practice

Background: The trade associations for the natural gas and hazardous liquid pipeline industries (led by the American Petroleum Institute or API) are working together to develop consensus standards to expand the public awareness programs that pipeline operators conduct, and to further involve the local communities in ensuring pipeline safety. Public participation is being sought and is critical given that the current industry recommended practice was originally issued for use with hazardous liquid pipeline operators, not with the public. After the industry associations finalizes the practice, the Office of Pipeline Safety (OPS) will decide whether or not to adopt it as a regulatory requirement.

Critics have noted that while it is OPS' customary practice to rely on the industry associations to develop technical standards, the industry associations do not have expertise in the development of public awareness programs. Furthermore, non-industry groups (property owners, communities, health care professionals, excavators, and environmentalists) are not effectively represented in an industry-led process.

Proposal: The Citizens Committee will actively participate in the API process to develop a nationwide recommended practice on public awareness. Highlighting its independent status and statutory advisory role, the committee can step forward and take the lead in Washington state in aggressively seeking public input on this matter.

Actions would include:

- An initial survey of the information pipeline companies provide door-to-door along their routes.
- Arrange a series of hearings\meetings in strategic locations around the state. The meetings would include a presentation by the company or companies current educational efforts and feedback from the public, with a special emphasis on getting comments from those who live along the route.
- Encourage companies to promote attendance at the meetings through mailings to residents along routes.
- Press releases promoting the hearings.
- The committee would focus on identifying the audience, message content, and delivery mechanisms.

The Citizens Committee is ideally situated to collect this information. The tenor should be one where its safe for the companies to talk candidly about their current education process and the types of information they feel they need to share. But in exchange, every effort must be made to get quality feedback from people who live on or near pipeline routes.

Status of API process: API has made the attached tentative outline available for review. The draft recommended practice is not expected to be available for review and comment until July 2002. The industry associations intend to publish the recommended practice in late 2002.

American Petroleum Institute Tentative Outline

Tentative Outline of RP 1123 Public Awareness Programs Programs for Natural Gas and Liquid Pipelines
Introduction and Scope
2. Public Awareness Program Development – The "Approach"
3. Determining Audience
Consideration for Integrity Management / HCA Communications (future section)
5. Message Content
(and needs assessment)
6. Message / Delivery Tools – The What
7. Medium or Vehicle of Delivery – The How:
8. Frequency Requirements
Program Evaluation and Effectiveness
10. Program Documentation
11. Conclusions
12. Appendices
 Communications Toolbox
 Matrices
 Tables
 Definitions / Terminology
 Templates/Forms
 References to applicable regulations
Website Links